

UNITED STATES BANKRUPTCY COURT
for the Eastern District of Pennsylvania

In re :
Sausan E. Kassar : Case No. 22 - 13038
Debtor. : (Chapter 13)
: Hon. Patricia M. Mayer
:

Debtor's Objection to Proof of Claim (Claim No. 8)

AND NOW, comes Debtor, Sausan E. Kassar, by and through her attorney, Ronald G. McNeil, Esquire, hereby objects to the Proof of Claim, filed by U.S. Bank Trust, N.A, as Trustee of Chalet Series IV Trust c/o SN Servicing Corp. ("SN Srvcg"), for a secured claim of \$332,901.74 which included pre-petition arrearage of \$164,505.24, and, responds to Creditor's proposed total claim, and, in support thereof, states as follows:

1. Debtor states that this proof of claim should be disallowed/modified, because the Creditor has not provided documentation for the following fees and costs: principal balance, missed monthly payments, interest due, fees and costs due, and escrow deficiency for funds. *See, In re Harmon*, 72 B.R. 458, 461 and 462 (Bankr. E.D.Pa. 1987).
2. Debtor states that this proof of claim should be disallowed/modified, because the principal balance, missed monthly payments, interest due, fees and costs due, and escrow deficiency for funds are not actual and are unreasonable. *See, In re Burwell*, 107 B.R. 62, 66 (Bankr. E.D.Pa. 1989); 11 U.S.C. § 506(b).

WHEREFORE, Debtor respectfully requests that Honorable Court to modify the proof of claim filed by SN Srvcg and to order such other and further relief as is just and proper.

Respectfully submitted,

/s/ Ronald G. McNeil
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Attorney for Debtor
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